James Brown (MT No. 8916) THE JAMES BROWN LAW OFFICE, PLLC 30 South Ewing Street, Suite 100 Helena, Montana 59601 Ph.: (406) 925-1745

Email: jim@thunderdomelaw.com

Thomas R. McCarthy*
Tyler R. Green*
Bryan Weir*
Cameron T. Norris*
CONSOVOY MCCARTHY PLLC
1600 Wilson Boulevard, Suite 700
Arlington, VA 22209
Ph.: (703) 243-9423

Email: tom@consovoymccarthy.com

* Motion for admission pro hac vice forthcoming

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA HELENA DIVISION

DONALD J. TRUMP FOR PRESIDENT, INC., REPUBLICAN NATIONAL COMMITTEE, NATIONAL REPUBLICAN SENATORIAL COMMITTEE; MONTANA REPUBLICAN STATE CENTRAL COMMITTEE,

Plaintiffs,

v.

STEPHEN BULLOCK, in his official capacity as Governor of Montana; COREY STAPLETON, in his official capacity as Secretary of State of Montana,

Defendants.

No. 6:20-cy-00066-DLC

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Plaintiffs hereby move for a preliminary injunction enjoining enforcement of Defendant Governor Stephen Bullock's August 6, 2020 directive, see Ex. 1, which usurps the role reserved for the Montana State Legislature in controlling the time, place, and manner of congressional elections and the manner of selecting electors for the presidency. This motion is based on the memorandum, declaration, and exhibits filed herewith, and the pleadings on file.

Dated: September 2, 2020

Respectfully submitted,

/s/ James Brown

James Brown (MT No. 8916) THE JAMES BROWN LAW OFFICE, PLLC 30 South Ewing Street, Suite 100 Helena, Montana 59601 Ph.: (406) 925-1745

Email: jim@thunderdomelaw.com

Thomas R. McCarthy* Tyler R. Green* Bryan Weir* Cameron T. Norris* CONSOVOY MCCARTHY PLLC 1600 Wilson Boulevard, Suite 700 Arlington, VA 22209

Ph.: (703) 243-9423

Email: tom@consovoymccarthy.com

* Motion for admission pro hac vice filed

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing document to be served via first class U.S. Mail

on September 2, 2020, on all defendants:

Governor Stephen Bullock PO Box 200801 Helena, MT 59620-0801

Secretary of State Corey Stapleton Montana Capitol Building, Rm 260 P.O. Box 202801 Helena, MT 59620-2801

/s/ James Brown

James Brown (MT No. 8916) THE JAMES BROWN LAW OFFICE, PLLC 30 South Ewing Street, Suite 100 Helena, Montana 59601

Ph.: (406) 925-1745

Email: jim@thunderdomelaw.com